

### [Privacy Policy](#)

Pathfinder Planning LLC recognizes that our relationships with current and prospective clients are based on integrity and trust. We work hard to maintain your privacy and to preserve the private nature of our relationship with you. We place the highest value on the information you share with us. Pathfinder Planning LLC will not disclose your personal information to anyone unless it is required by law or at your direction. We will not sell your personal information.

#### **Why We Collect Your Information**

We gather information about you so that we can:

- Help design and implement the investment and planning related services we provide you; and
- Comply with the Federal and State laws and regulations that govern us.

#### **What Information We Collect and Maintain**

We may collect the following types of “nonpublic personal information” about you:

- Information from our initial meeting or subsequent consultations about your identity, such as your name, address, social security number, date of birth, and financial information.
- Information that we generate to service your financial needs.
- Information that we may receive from third parties with respect to your financial profile.

#### **What Information We Disclose**

We are permitted by law to disclose nonpublic information about you to unaffiliated third parties in certain circumstances. For example, in order to provide planning or investment management services to you, we may disclose your personal information in limited circumstances to various service providers, such as our clearing firm or independent contractors hired by Pathfinder Planning LLC.

Pathfinder Planning LLC will not disclose any personal information about you or your accounts unless one of the following conditions is met:

- We receive your prior written consent; or
- We have documentation that the recipient is your authorized representative; or
- We are required by law to disclose information to the recipient

Arrangements with companies or independent contractors not affiliated with Pathfinder Planning LLC will be subject to confidentiality agreements.

#### **How We Protect Your Personal Information**

Privacy is always important to us. We restrict and limit access to client information only to those who need to carry out their business functions. We educate employees about safeguarding client information and preventing its unauthorized access, disclosure, or use. Employees will be required to acknowledge their acceptance and understanding of the privacy policy in writing. We maintain physical, electronic, and procedural safeguards to protect your confidential personal information.

We use cloud computing for gathering client data, running planning scenarios, supporting business accounting, and maintaining permanent files. We only use sites that are password protected and SSL-encrypted for maximum security. Should there be an information breach with a vendor who supports our firm, we will let you know immediately.

#### **Former Clients**

Even if we cease to provide you with financial services, our Privacy Policy will continue to apply. We will continue to treat your nonpublic information with strict confidentiality. We maintain all records regarding former clients for the retention period required by law.

### Code of Ethics

Pathfinder Planning LLC follows the Code of Ethics and Practice Standards as established by the Certified Financial Planner Board of Standards, Inc. According to these rules, a CFP® professional must:

1. Act with honesty, integrity, competence, and diligence.
2. Act in the client's best interests.
3. Exercise due care.
4. Avoid or disclose and manage conflicts of interest.
5. Maintain confidentiality and protect the privacy of client information.
6. Act in a manner that reflects positively on the financial planning profession and CFP® certification.

As per State and Federal regulations, Pathfinder Planning LLC has established our company's Code of Ethics. In summary, these include:

- The duty to place the interests of clients first.
- Personal securities transactions that avoid the appearance of a conflict of interest with respect to clients.
- Avoiding actions or activities that allow, or appear to allow, an employee person to profit or benefit from his or her position with PPLLC at the expense of clients.
- Prohibition from engaging in any practice that defrauds or misleads any client or engaging in any manipulative or deceitful practice with respect to clients or securities.

### Business Continuity

Pathfinder Planning LLC has developed a Business Continuity Plan that addresses how we will respond to a business disruption. Since the timing and impact of disasters and disruptions is unpredictable, we will be flexible in responding to actual events. With that in mind, here is the information you need to know regarding our business continuity plan.

**The Plan** – We plan to quickly recover and resume operations after a significant business disruption and respond by safeguarding our employees and property, making a financial and operational assessment, and protecting the firm’s information. In short, our plan is designed to permit us to resume operations as quickly as possible, given the scope and severity of the significant business disruption.

Our business continuity plan addresses: data backup and recovery; all mission critical systems; financial and operational assessments; alternative communications with customers, employees, and regulators; alternate physical location of employees; critical supplier, contractor, bank, and counter-party impact; and regulatory reporting.

In the event of a significant business disruption, Financial Planning clients will need to contact their individual broker/dealer/custodian regarding the execution, comparison, allocation, clearance and settlement of securities transactions, maintenance of customer accounts, access to customer accounts and the delivery of funds and securities. We will make these contacts for clients who have an Asset Management relationship with us.

Our permanent documents are stored electronically and available to the company virtually from any area. Our goal is to restore our operations and be able to complete existing planning engagements and accept new planning engagements within one to two business days, depending on the circumstances.

**Varying Disruptions** – Significant business disruptions can range from incidents that affect only the firm, the main office, the business area where our firm is located, the city where we are located, or the whole region. Within each of these areas, the severity of the disruption can also vary from minimal to severe. Regardless of the situation, we plan to continue in business and notify you directly via email or indirectly on our [Facebook page](#).

**Contact** – After a significant business disruption you can use the following information to find current information:

Phone: 704.301.7522

Email: [info@pathfinderplanningllc.com](mailto:info@pathfinderplanningllc.com)

Pathfinder Planning Facebook Page: <https://www.facebook.com/PathfinderPlanning>

Your Financial Mom Facebook Page: <https://www.facebook.com/Your-Financial-Mom>

**For more information** – If you have questions about our business continuity planning, you can contact us at 704.301.7522 or [info@pathfinderplanningllc.com](mailto:info@pathfinderplanningllc.com).